UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BLOWFISH, LLC,	)
Plaintiff	)
v.	)
G.A. RESTAURANT, INC., d/b/a "BLOWFISH RESTAURANT", STAVROULA FOTOPOULOS, AND GEORGE KAMBERIDES,	)
Defendants.	)

ANSWER

The Defendants hereby answer the Complaint filed by the Plaintiff, Blowfish, LLC as follows:

I. NATURE OF ACTION

1. This paragraph constitutes a conclusion to which no answer is necessary.

II. JURISDICTION

2. This paragraph constitutes a conclusion to which no answer is necessary.

3. This paragraph constitutes a conclusion to which no answer is necessary.

III. PARTIES

4. [mistakenly omitted].

5. The Defendants lack sufficient knowledge or information to admit or deny this allegation.

6. Admitted.

7. Admitted.

8. Admitted.

IV. ALLEGATIONS TO [SIC] COMMON TO ALL CLAIMS

8. [sic] The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

9. The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

10. The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

11. Admitted.

12. The Defendants deny ever having received this letter, and answer further by stating that Exhibit “B” speaks for itself.

13. Admitted.

14. Denied.

15. Denied.

16. The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

FIRST CLAIM FOR RELIEF

Infringement of Federally Registered Trademarks (15 U.S.C. § 1114(1))

17. The Defendants repeat and hereby incorporate by reference the allegations set forth in paragraphs 1 through 17 above.

18. The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

19. Denied insofar as the Defendants' business is "Blowfish Restaurant" and not "Blowfish Sushi to Die For". The Defendant answers further by stating that the word "blowfish" is simply a type of fish.

20. Denied insofar as the "Blowfish Restaurant" does not serve Sushi, does not advertise on the internet or elsewhere, and does no business outside of Roslindale, Massachusetts.

21. Denied.

22. Admitted.

23. Denied.

24. The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

25. Denied.

26. The Defendants admit the allegation contained in the first sentence of this paragraph, but deny the remainder of the allegations in this paragraph.

27. Denied.

28. Denied.

29. Denied.

SECOND CLAIM FOR RELIEF

Unfair Competition Under the Lanham Act, 15 U.S.C. § 1125(a)

30. The Defendants repeat and hereby incorporate by reference the allegations set forth in paragraphs 1 through 29 above.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

THIRD CLAIM FOR RELIEF

Dilution Under the Lanham Act, 15 U.S.C. § 1125(c)

35. The Defendants repeat and hereby incorporate by reference the allegations set forth in paragraphs 1 through 34 above.

36. The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

37. The Defendants lack sufficient knowledge or information to admit or deny this allegation and call upon the Plaintiff to prove same.

38. The Defendants admit their use of the name "Blowfish Restaurant" but deny that it is confusingly similar to "Blowfish Sushi to Die For".

39. Denied.

40. Denied.

41. Denied.

FOURTH CLAIM FOR RELIEF

Common Law State Trademark Infringement

42. The Defendants repeat and hereby incorporate by reference the allegations set forth in paragraphs 1 through 41 above.

43. Denied.

44. Denied.

45. Denied.

FIFTH CLAIM FOR RELIEF

M.G.L. c. 93A, §§ 2 and 11

46. The Defendants repeat and hereby incorporate by reference the allegations set forth in paragraphs 1 through 45 above.

47. The Defendants deny ever having received this letter, and answer further by stating that Exhibit "B" speaks for itself.

48. The Defendants admit that they failed to respond to the letter, but deny that they "refused" to respond to it.

49. Admitted.

50. Denied.

51. Denied insofar as the Defendant's use of the name "Blowfish Restaurant" is not "unlawful". The Defendants answer further by stating that they do conduct business exclusively in the Commonwealth of Massachusetts.

52. Denied.

WHEREFORE, the Defendants request this Court to dismiss the Complaint of the Plaintiff in its entirety and award them costs.

THE DEFENDANTS

By their Attorney,

____/s/ Isaac H. Peres_____________

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those as non registered participants on October 19, 2010.

/s/ Isaac H. Peres_____________